

UNITED STATES DISTRICT COURT

for the
District of Oregon

FILED 08 MAY '19 14:38 USDC-ORP

In the Matter of the Search of

*(Briefly describe the property to be searched
or identify the person by name and address)*U.S. Priority Mail Express parcel EE104466127US as
described in Attachment A.

Case No. '19-MC-408

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

U.S. Priority Mail Express parcel EE104466127US as described in Attachment A.

located in the _____ District of _____ Oregon _____, there is now concealed *(identify the person or describe the property to be seized)*:

The information and items set forth in Attachment B hereto.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

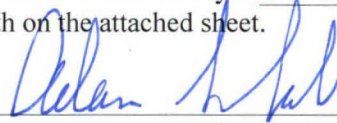
- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. § 841(a)(1) and 846	Unlawful Distribution of Controlled Substances and Conspiracy to do the same.
21 U.S.C. § 843(b) and 846	Unlawful Use of Mail in Controlled Substance Violation and Conspiracy.
18 U.S.C. § 1952(a)(1)	Unlawful Use of the Mail with Intent to Distribute the Proceeds of Unlawful Activity.

The application is based on these facts:
 See affidavit which is attached hereto and incorporated herein by this reference.

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

ADAM L. SALE, Postal Inspector

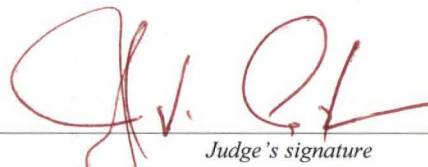
Printed name and title

Sworn to before me and signed in my presence.

Date:

May 8, 2019

City and state: Portland, Oregon



Judge's signature

JOHN V. ACOSTA, United States Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT)
)
DISTRICT OF OREGON)

AFFIDAVIT OF ADAM SALE

Affidavit in Support of an Application
Under Rule 41 for a Search Warrant

I, Adam Sale, being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am a Postal Inspector with the United States Postal Inspection Service (USPIS) and have been since July 2014. I am currently assigned to the Portland, Oregon Domicile Office of the USPIS. As a Postal Inspector, I am empowered by 18 U.S.C. § 3061 to conduct investigations and to make arrests for offenses against the United States. As part of my duties, I investigate incidents where the United States mail system is used for the purpose of transporting non-mailable matter, including controlled substances such as marijuana, cocaine, methamphetamine, and heroin, as well as proceeds of the sale of controlled substances. In April 2004, I attended the Criminal Investigator Training Program at the Federal Law Enforcement Training Center (F.L.E.T.C.) in Glynco, Georgia. From April 2004 to July 2014, I served as a U.S. Secret Service Special Agent. Prior to that, I served eight years in the U.S. Army as a Commissioned Officer, achieving the rank of Captain. In September 2014, I completed a USPIS training course on Prohibited Mailings involving narcotics.

Applicable Law

2. I submit this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search U.S. Priority Mail Express parcel EE104466127US (hereinafter "Subject Parcel"), as described in Attachment A, for evidence, contraband, fruits, and instrumentalities of violations of the federal criminal statutes involving the Unlawful Use of the U.S. Mail with Intent to Distribute Proceeds of Unlawful Activity, in

violation of 18 U.S.C. § 1952(a)(1); the Unlawful Use of a Communication Facility (U.S. Mail) to Distribute Controlled Substances, in violation of 21 U.S.C. § 843(b), and Conspiracy to commit this offense, in violation of 21 U.S.C. § 846; the Distribution of Controlled Substances, in violation of 21 U.S.C. § 841(a)(1), and Conspiracy to commit this offense, in violation of 21 U.S.C. § 846; and criminal forfeiture related to drug trafficking, as provided in 21 U.S.C. § 853. As set forth below, I have probable cause to believe that such property and items, as described in Attachment B, will be found in the Subject Parcel, as described in Attachment A. The Subject Parcel is presently in the possession of the U.S. Postal Inspection Service at the USPIS Portland Domicile, 7007 NE Cornfoot Rd., Portland, OR 97218.

3. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, a review of records related to this investigation, and information gained through my training and experience.

Background on Controlled Substances Sent Through the U.S. Mail

4. I know from my training and experience that drug traffickers frequently use U.S. Postal Service Priority Mail Express and Priority Mail services to ship controlled substances, including marijuana, cocaine, heroin, and methamphetamine. I know from my training and experience that illegal drug recipients often use U.S. Postal Service Priority Mail Express and Priority Mail services to ship the proceeds of the illegal sale of controlled substances, or moneys used or intended to be used to facilitate the illegal sale of controlled substances, in cash, or other controlled substances, to suppliers of controlled substances. I know from training and

discussions with other law enforcement officers that these controlled substances, proceeds of the illegal sale of controlled substances, and funds related to the facilitation of the illegal sale of controlled substances are often found during parcel investigations and interdictions.

5. Based on my experience, training, and discussions with other law enforcement officers experienced in drug investigations, I know Oregon is a marijuana source state for the mailing of controlled substances to destination locations across the United States. Current Oregon state laws permitting the recreational and medical growth, purchase, and possession of marijuana provide individuals with significant quantities of marijuana, which can be illegally mailed to other states where marijuana is illegal and less available. Accordingly, marijuana sales are substantially more profitable outside the state of Oregon than they are inside the state of Oregon. I know from my training and experience that controlled substances, especially marijuana, are frequently mailed from Oregon to other states and that cash payments are mailed back to Oregon drug suppliers in return.

6. Based on my experience, training, and discussions with other law enforcement officers experienced in drug investigations, I know that certain indicators often exist when drug traffickers use the U.S. mails to ship controlled substances, proceeds of the sale of controlled substances, or funds to facilitate the sale of controlled substances from one location to another.

7. Drug traffickers use U.S. Postal Service Priority Mail Express and Priority Mail services because of the reliability of delivery, speed of delivery, low cost, the customer's ability to track the package's shipment online, as well as the low risk of detection by law enforcement. Shippers using U.S. Postal Service Priority Mail Express and Priority Mail services pay for the benefit of being able to confirm the delivery of the parcel by checking the U.S. Postal Service website or calling a toll-free number.

8. I know from my training and experience that U.S. Postal Service Priority Mail Express is used primarily for business-related mailings. Unlike typical U.S. Postal Service Priority Mail Express business mailings, which usually have typed labels, packages containing controlled substances, proceeds, and/or facilitation funds often have handwritten address information. The handwritten label on U.S. Postal Service Priority Mail Express packages containing controlled substances and/or proceeds usually does not contain a business account number and/or credit card number. This is an indication that the sender likely paid cash. A credit card or business account number would better enable law enforcement officers to connect the package to identifiable individuals. I further know that drug traffickers who use U.S. Postal Service Priority Mail Express services often either waive or do not request a recipient signature upon delivery of the mail parcel. This can allow the parcel to be delivered without the addressee or the addressee's agent having to sign for the parcel, contingent upon the parcel being left in a secure location at the address.

9. I know from my training and experience that drug traffickers who mail controlled substances, and the drug purchasers who send payment in the form of cash or other drugs, often use false or incomplete information in labeling the parcels. In this way, drug traffickers can distance themselves from the package containing controlled substances, the proceeds of the sale of the controlled substances, or facilitation funds in the event the package is intercepted by law enforcement.

10. I know from my training and experience that drug traffickers who mail controlled substances, proceeds of the illegal sale of controlled substances, and facilitation funds are often aware that parcels are inspected by trained canines. Accordingly, drug traffickers often attempt to wrap their parcels, and the contents of their parcels, in a manner they believe will disguise the

odor and contents of the items in the parcels. In order to conceal the distinctive smell of controlled substances from certified controlled substance detection canines, these packages are sometimes sealed with the use of tape around the seams. Also, the parcels often contain other parcels which are carefully sealed to prevent the escape of odors. Sometimes perfumes, coffee, dryer sheets, tobacco, or other strong-smelling substances are used to mask the odor of the controlled substances, proceeds of the illegal sale of controlled substances, and/or facilitation funds being shipped.

Statement of Probable Cause

11. On March 7, 2019, unknown persons mailed the Subject Parcel at the Grants Pass Post Office, 132 NW 6th St., Grants Pass, OR, 97526-2003. The employees referred the parcel to the USPIS Portland Domicile as a parcel they believed contained illegal controlled substance.

12. On March 12, 2019, the USPIS Portland Domicile received the Subject Parcel and conducted an investigation of the parcel. The Subject Parcel displayed the sender address of "Carquest Auto, 525 NE E St., Grants Pass, OR 97526" and a recipient address of "Paul Brown, 181 Klauser Dr., Quincy, IL 62301." The parcel weighed 8 pounds, 10 ounces, the scheduled date of delivery was March 9, 2019 before 1500 PST, and the mailer paid \$91.85 in cash to purchase the postage. Inspectors noticed the mailing label was handwritten and it appeared it was addressed from a business to a private individual.

13. The "Signature Required" service on USPS Priority Mail Express parcels requires the parcel be received by an individual who must sign for the parcel and provide their name. I know from my training and experience that drug traffickers who mail controlled substances, and the drug purchasers who send payment in the form of cash or other drugs normally do not request the Signature Required service to avoid law enforcement identifying the true recipient of

parcels. In this way, drug traffickers can distance themselves from the package containing controlled substances or from the proceeds of the sale of the controlled substances in the event the package is intercepted by law enforcement. I observed the "Signature Required" box on the label of the Subject Parcel was not checked by the mailer.

14. I know people use Priority Mail Express services for parcels containing items they consider valuable, important or requiring rapid delivery and will often include their phone number on the mailing label spaces provided so the postal service may contact them in the event a parcel is mis-shipped, damaged, or the delivery address is illegible. I noticed the Subject Parcel did not display phone numbers for the sender or recipient. Based on my training and experience, I know drug traffickers often choose not to include phone numbers, or put incorrect phone numbers on parcels, as they are often aware that phone numbers can be traceable to their own names or physical location.

15. Investigators located a telephone number for the Carquest Auto using open sources. A telephone call to the sender revealed the sender does not mail parcels using the USPS and did not mail the Subject Parcel.

16. A review of law enforcement databases showed Paul Brown is not associated with the recipient address.

17. The combination of the displayed sender not sending the parcel, the displayed recipient not associated with the recipient address, the Signature Confirmation service not requested, and the lack of telephone numbers on the Subject Parcel gave me reasonable suspicion to believe the Subject Parcel contained illegal controlled substance.

18. Continuing on March 12, 2019, I directed the Subject Parcel be entered into the USPS Administrative Non-mailability Program and scanned "Seized by Law Enforcement" in

the USPS Product Tracking and Reporting (PTR) system. PTR is the system that allows customers to check and/or receive updates to the progress of parcels as they travel through the USPS delivery system. The "Seized by Law Enforcement" entry tells the customer to contact the USPIS to make inquiries about the status of seized parcels.

19. On March 13, 2019, letters notifying the sender and recipient of the administrative seizure of the Subject Parcel and the process to make a claim for the parcel were sent to the sender and recipient addresses. No one contacted the USPIS to inquire about the status of, or make a claim for the Subject Parcel, as of the writing of this affidavit.

20. On May 6, 2019, I received the following information from Inspector Justin Ebbing, West Central Illinois Task Force, Quincy, IL, reference the Subject Parcel: On August 22, 2018, a confidential Source (CS) contacted Inspector Nick Hiland of the West Central Illinois Task Force. The CS told Inspector Hiland that he/she was aware of a group of people from the Quincy, IL area that were traveling to California for the purpose of purchasing MDMA and cannabis to transport to the Quincy, IL to sell. The CS advised the subjects would travel in two rental vehicles, one of which was a gray Jeep. The CS provided the phone numbers for suspects Ebony Werner and Porter Peoples. Officers used this information to request and receive GPS ping orders for both phone numbers.

21. On August 24, 2018, Officers began receiving GPS pings from the phone of Porter Peoples. It showed the cell phone was located in western Oregon.

22. On August 26, 2018, Officers continued reviewing the GPS pings which showed the phone was close to the Quincy, IL area. Further review of ping location information showed the phones moving to Mount Pleasant, IA. Inspectors Ebbing and Hiland drove to the Mount Pleasant, IA area and located two suspect vehicles.

23. Continuing on August 26, 2018, officers conducted a probable cause traffic stop of the silver Jeep and a silver Mazda. Officer located Maqualla Gholston and Deamontae Hill in the Mazda and Porter Peoples, Rashad Snoddy, and Ebony Werner in the Jeep. Officers located a total of five black duffel bags which all contained cannabis in vacuum sealed bags in the Mazda. The total weight of the cannabis was approximately 84 pounds.

24. Search warrants conducted on multiple cell phones seized during the traffic stops and interviews found the subjects had traveled to the Medford, OR, area specifically 3960 Independence School Road, Medford, OR 97501.

25. On February 19, 2019, FedEx contacted the West Central Illinois Task Force in reference to a suspicious package. Fedex advised that Denesa Smith, a black female, 20 years of age, shipped a package to Los Angeles, CA using their overnight service. Fedex opened the package and located \$7,950 in United State currency inside the parcel. FedEx representatives contacted law enforcement

26. Officers were aware Smith was the girlfriend of Deamontae Hill. Fedex employees said Hill came to the store in the past and sent packages. Fedex employees looked at photographs of Smith and Hill, and they identified them as the subjects who sent packages.

27. On March 13, 2019, Officers executed a search warrant at the residence of Deamontae Hill, 625 Lind St., Quincy, IL 62301. Officers previously received information Hill began selling cannabis again and currently had multiple pounds of cannabis at his residence. Officers entered the residence and located Hill inside. Officers seized the following pursuant to the search warrant: \$7,280 in United States currency, 298.5 grams of cannabis, Vacuum seal bags and packaging materials.

28. Officers arrested and interviewed Hill. Hill admitted to selling cannabis and collecting money in connection with Porter Peoples. Hill provided consent to search his cell phone. Officers reviewed the contents of his cell phone and located several messages related to cannabis sales. They also located a text message thread that contained several messages with USPS tracking numbers. Officers observed the most recent USPS tracking number as the tracking number of the Subject Parcel. The status of the Subject Parcel showed "Seized by Law Enforcement." Officers asked Hill about the Subject Parcel. He stated the Subject Parcel was ordered by Porter Peoples. He stated Peoples has been getting cannabis and cannabis wax mailed from Oregon to Quincy, IL.

29. On April 11, 2019, a search warrant was conducted at 3960 Independence School Road, Medford, OR 97501. Officers seized the following items during the execution of the search warrant: \$557,488.00 U.S. Currency, 14,497 indoor marijuana plants, 1,907.7 lbs. of marijuana (total gross weight which included all marijuana seized), 29 firearms including two (2) fully-automatic rifles, 6,000 Butane Hash Oil (BHO) cartridges, 141,838.3 gross grams of other BHO product, 1,047 gross grams of psilocybin mushrooms, and LSD.

30. Description of Subject Parcel

U.S. Priority Mail Express parcel number:	EE104466127US
Sender name and address:	Carquest Auto 525 NE E St. Grants Pass, OR 97526
Recipient name and address:	Paul Brown 181 Klauser Dr. Quincy, IL 62301
Parcel Type:	Priority Mail Express Cardboard Box
Parcel Weight:	8 pounds, 10 ounces

31. The Subject Parcel was paid for with cash, there are no telephone numbers listed for the sender or recipient, the Signature Required box was not checked, the sender stated they did not send the parcel, the recipient is not associated with the recipient address, the recipient did not contact the USPIS to inquire about the Subject Parcel, and the details of the Quincy, IL investigation indicate the Subject Parcel contains illegal controlled substance.

32. Based on my training and experience, all of these characteristics of the Subject Parcel are consistent with drug trafficking. The Subject Parcel appears to contain drugs or drug proceeds, based on the statements made by the suspect in Quincy, IL. Consequently, based on these facts, and others detailed in this affidavit, I have probable cause to believe, and do believe, that a search of the Subject Parcel will yield evidence of criminal activity.

Conclusion

33. Based on the foregoing, I have probable cause to believe, and I do believe, that the Subject Parcel more completely described in Attachment A, contains evidence, contraband, fruits, and instrumentalities of violations of the federal criminal statutes involving the Unlawful Use of the U.S. Mail with Intent to Distribute Proceeds of Unlawful Activity, in violation of 18 U.S.C. § 1952(a)(1); the Unlawful Use of a Communication Facility (U.S. Mail) to Distribute Controlled Substances, in violation of 21 U.S.C. § 843(b), and Conspiracy to commit this offense, in violation of 21 U.S.C. § 846; the Distribution of Controlled Substances, in violation of 21 U.S.C. § 841(a)(1), and Conspiracy to commit this offense, in violation of 21 U.S.C. § 846; and criminal forfeiture related to drug trafficking, as provided in 21 U.S.C. § 853. As set forth above, I have probable cause to believe that such property and items, as described in Attachment B, will be found in the Subject Parcel, as described in Attachment A. I therefore request that the

Court issue a warrant authorizing a search of the Subject Parcel described in Attachment A for the items listed in Attachment B and the seizure of any such items found.

34. Prior to being submitted to the Court, this affidavit, the accompanying application, and the requested search warrant were all reviewed by Assistant United States Attorney (AUSA) Leah K. Bolstad and AUSA Bolstad advised me that, in her opinion, the affidavit and application are legally and factually sufficient to establish probable cause to support the issuance of the requested warrant.



ADAM L. SALE
US Postal Inspector
United States Postal Inspection Service

Subscribed and sworn to before me this 8th day of May 2019.



HONORABLE JOHN V. ACOSTA
United States Magistrate Judge

Attachment A

Parcel to be Searched:

The following U.S. Postal Service parcel, presently in the possession of the U.S. Postal Inspection Service at the USPS Portland Domicile, 7007 NE Cornfoot Dr., Portland, OR 97218:

DESCRIPTION OF THE SUBJECT PARCEL

Subject Parcel

U.S. Priority Mail Express parcel number: EE104466127US

Sender name and address: Carquest Auto
525 NE E St.
Grants Pass, OR 97526

Recipient name and address: Paul Brown
181 Klauser Dr.
Quincy, IL 62301

Parcel Type: Priority Mail Express Cardboard Box

Parcel Weight: 8 pounds, 10 ounces



Attachment B

Particular Things to be Seized:

The following controlled substances, records, documents, and items that constitute evidence, contraband, fruits, and/or instrumentalities of violations of the following federal criminal statutes involving the unlawful use of the U.S. mails with intent to distribute controlled substances and proceeds of the unlawful use of the U.S. mails with intent to distribute controlled substances and proceeds of unlawful activity in violation of 21 U.S.C. §§ 841(a)(1), 843(b) and 846; and 18 U.S.C. § 1952(a)(1), and criminal forfeiture related to drug trafficking, as provided in 21 U.S.C. § 853:

1. Controlled substances, including marijuana, methamphetamine, cocaine, heroin, and any other illegal controlled substance listed in DEA Scheduling of Controlled Substances.
2. Currency and proceeds of controlled substance trafficking.
3. Packaging material and contents.
4. Any items of identification, records, correspondence, accounts, ledgers, pay-and-owe sheets, or other documents associated with the manufacture, distribution, or possession of controlled substances or the possession or distribution of currency and proceeds of controlled substance trafficking, or with the laundering of monetary instruments.